

July 16, 2021

Via ECF

Honorable Peggy Kuo, U.S.M.J. U.S. District Court Eastern District of New York U.S. Courthouse Room 1207S 225 Cadman Plaza East Brooklyn, NY 11201

> Re: Gill v. Jus Broadcasting Corp. et al. Case No. 1:19-cv-4216 (ILG)(PK)

Dear Judge Kuo:

I respond to Penny Sandhu's most recent declaration wherein she explains the procedure she used to separate the emails with the Key Words which were then forwarded to my office. The Court's Order dated July 6, 2021 provided Defendants with a further opportunity to correctly cull the emails. Therein, Your Honor clearly stated, "These emails were NOT to be limited to those between Penny Sandhu and Plaintiff." [emphasis provided]. Thereafter, Penny Sandhu responded on July 14, 2021 [Docket Entry 125]. At paragraph 5, she specifically limited the Key Word search to ". . . emails exchanged between penny@jusbroadcasting.com and kashmirgill@jusbroadcasting.com." This limitation was in direct violation of the Court's instructions. It is clear that Penny Sandhu continues to defy Court Orders.

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I am requesting that the Court appoint a third party to cull the emails at Defendants'

expense. I am also requesting that the Court compel Defendants to respond to the Interrogatories

and document production as requested in my prior submission.

Respectfully submitted,

LAW OFFICES OF ALAN R. ACKERMAN

BY: ALAN R. ACKERMAN, ESQ.

ARA/ bc

cc: Kashmir Gill

Paul Batista, Esq.